1 2 3 4 5 6 7 8	Ramon Rossi Lopez rlopez@lopezmchugh.com (California Bar Number 86361; admitted pr Lopez McHugh LLP 100 Bayview Circle, Suite 5600 Newport Beach, California 92660 949-812-5771  Mark S. O'Connor (011029) moconnor@beusgilbert.com Beus Gilbert, PLLC 701 N. 44 <sup>th</sup> Street Phoenix, Arizona 85008 602-429-3019  Co-Lead/Liaison Counsel for Plaintiffs	ro hac vice)	
9		C DICTRICT COURT	
10			
11		OF ARIZONA	
12	In Re Bard IVC Filters Products Liability Litigation	No. MD-15-02641-PHX-DGC	
13 14		PLAITNIFF'S NOTICE OF LODGING PLAITNIFF'S CONTROVERTING STATEMENT OF FACTS	
15		(Assigned to the Honorable David G.	
16		Campbell)	
17		(Tinlin Bellwether Case)	
18 <del>-</del> 19 20 21	Pursuant to LRCiv 5.6(d), Plaintiffs submit this Notice of Lodging Plaintiff's Controverting Statement of Facts and exhibits thereto.  As required under LRCiv 5.6(d), Plaintiffs certify that on March 1, 2019, the parties met and conferred in good faith and were unable to agree about whether the		
22	documents are confidential under the Protective Order and should be filed under seal. This		
23	dispute notwithstanding the parties have agreed to continue to meet and confer on the		
24	documents at issue		
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1	RESPECTFULLY SUBMITTED this 1st day of March, 2019.	
2	BEUS GILBERT, PLLC	
3	By: /s/ Mark S. O'Connor	
4	Mark S. O'Connor 701 N. 44 <sup>th</sup> Street	
5	Phoenix, Arizona 85008	
6	LOPEZ McHUGH LLP	
7	Ramon Rossi Lopez (CA Bar No. 86361) (admitted <i>pro hac vice</i> ) 100 Bayview Circle, Suite 5600 Newport Beach, California 92660	
8	100 Bayview Circle, Suite 5600 Newport Beach, California 92660	
9	Co-Lead/Liaison Counsel for Plaintiffs	
10	Co-Leua/Liaison Counsei for 1 iainiiffs	
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**CERTIFICATE OF SERVICE** I hereby certify that on this 1st day of March 2019, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing. /s/Jessica Gallentine